

**JOHN L. BURRIS, ESQ., SBN 69888**

LAW OFFICES OF JOHN L. BURRIS

Airport Corporate Center

7677 Oakport Street, Suite 1120

Oakland, CA 94621

Telephone: (510) 839-5200

Facsimile: (510) 839-3882

Email: [john.burris@johnburrislaw.com](mailto:john.burris@johnburrislaw.com)

**PATRICK BUELNA, ESQ., SBN 317043**

POINTER & BUELNA, LLP

LAWYERS FOR THE PEOPLE

Well Fargo Center

1901 Harrison St., Suite 1140,

Oakland, CA 94612

Tel: 510-929-5400

Email: [PBuelna@LawyersFTP.com](mailto:PBuelna@LawyersFTP.com)

UNITED STATES DISTRICT COURT

JEANNIE ATIENZA, individually and as  
successor-in-interest to Decedent LAUDEMÉR  
ARBOLEDA,

Plaintiff,

v.

TOWN OF DANVILLE, a municipal  
corporation; COUNTY OF CONTRA COSTA,  
a municipal corporation; ANDREW HALL,  
individually and in his capacity as a City of  
Danville Police Officer; and DOES 1-50  
inclusive,

Defendants.

CASE NO.: C19-03440 RS

**DECLARATION OF PATRICK BUELNA**

**Declaration of Patrick Buelna**

1 I, Patrick Buelna, declare:

2 1. I am an attorney who is licensed to practice law in California and before this  
3 Court. I represent the named Plaintiffs in the above-captioned action. I have personal  
4 knowledge of the facts contained in this declaration, and if called up to testify, I could and  
5 would testify competently as to the truth of the facts contained herein.

6 2. Attached as Exhibit 1 is a true and correct copy of an audio recording of the  
7 Danville Police Department Dispatch Audio. ["Dispatch Audio"]. The exhibit was manually  
8 filed on USB and served via electronic service to the Court's proposed order email and to  
9 Defendant's counsel.

10 3. Attached as Exhibit 2 is a true and correct copy of the Deposition of Nicholas  
11 Muller. ["Muller Depo"].

12 4. Attached as Exhibit 3 is a true and correct copy of the Deposition Charles Caruso.  
13 ["Caruso Depo"].

14 5. Attached as Exhibit 4 is a true and correct copy of the Deposition of Sonasi  
15 Maka. ["Maka Depo"].

16 6. Attached as Exhibit 5 is a true and correct copy of video recording from the body-  
17 worn camera of Nicholas Muller. ["Muller BWC."] The exhibit was manually filed on USB  
18 and served via electronic service to the Court's proposed order email and to Defendant's  
19 counsel.

20 7. Attached as Exhibit 6 is a true and correct copy of a portion of the County's Use  
21 of Force Policy.

22 8. Attached as Exhibit 7 is a true and correct copy of Deposition of Chris Martin.  
23 ["Martin Depo"].

24 9. Attached as Exhibit 8 is a true and correct copy of Deposition of Defendant  
25 Andrew Hall. ["Hall Depo"].

26 10. Attached as Exhibit 9 is a true and correct copy of video recording from the front-  
27 facing dashboard camera in the patrol vehicle of Chris Martin. ["Martin Dash Cam"]. The

1 exhibit was manually filed on USB and served via electronic service to the Court's proposed  
2 order email and to Defendant's counsel.

3 11. Attached as Exhibit 10 is a true and correct copy of video recording from the  
4 front-facing dashboard camera in the patrol vehicle of Nicholas Muller. ["Muller Dash  
5 Cam"]. The exhibit was manually filed on USB and served via electronic service to the  
6 Court's proposed order email and to Defendant's counsel.

7 12. Attached as Exhibit 11 is a true and correct copy of video recording from the  
8 body-worn camera of Defendant Andrew Hall. ["Hall BWC"]. The exhibit was manually filed  
9 on USB and served via electronic service to the Court's proposed order email and to  
10 Defendant's counsel.

11 13. Attached as Exhibit 12 is a true and correct copy of portions of the deposition  
12 transcript of Defendant Hall's statement to homicide investigators.

13 14. Attached as Exhibit 13 is a true and correct copy of portions of the deposition  
14 transcript of Lt. Johnsons the Rule 30 (b)(6) witness that is the Person Most Knowledgeable  
15 of Defendant Hall's trainings and policies for the use of deadly force.

16  
17  
18 I submit this Declaration under penalty of perjury under the laws of the United States and  
19 that this declaration was executed in Oakland, CA on June 17, 2021.

20  
21 /s/ Patrick Buelna

22 PATRICK M. BUELNA  
23 COUNSEL FOR PLAINTIFFS  
24  
25  
26  
27